

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FRANCHISE GROUP, INC., et al.,

Debtors.

Chapter 11

Case No. 24-12480 (JTD)
(Jointly Administered)

Related D.I. 192

**RE-NOTICE OF MOTION OF THE AD HOC GROUP OF FREEDOM LENDERS
FOR ENTRY OF AN ORDER (I) TERMINATING EXCLUSIVITY
IN THE HOLDCO DEBTORS' CASES, (II) LIFTING
THE AUTOMATIC STAY IN THE HOLDCO DEBTORS' CASES, OR
(III) APPOINTING A CHAPTER 11 TRUSTEE FOR THE HOLDCO DEBTORS**

PLEASE TAKE NOTICE that the hearing on the Ad Hoc Group of Freedom Lenders (the “Freedom Lender Group”) *Motion for Entry of an Order (I) Terminating Exclusivity in the Holdco Debtors’ Cases, (II) Lifting the Automatic Stay in the Holdco Debtors’ Cases, or (III) Appointing a Chapter 11 Trustee for the Holdco Debtors* (the “Motion”)¹ with the United States Bankruptcy Court for the District of Delaware (the “Court”) seeking entry of an order requesting various relief, as set forth more fully in the Motion, was originally set to be heard on December 10, 2014 at 10:00 a.m.

PLEASE TAKE FURTHER NOTICE that the hearing to consider the Motion will now be held on **December 17, 2024 at 11:00 a.m. (prevailing Eastern Time)** before the Honorable John T. Dorsey in the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801.

[Remainder of Page Intentionally Left Blank]

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion.

Dated: December 13, 2024

Respectfully submitted,

FARNAN LLP

/s/ Michael J. Farnan

Brian E. Farnan (Bar No. 4089)
Michael J. Farnan (Bar No. 5165)
919 North Market Street, 12th Floor
Wilmington, DE 19801
Telephone: (302) 777-0300
Facsimile: (302) 777-0301
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

Thomas E Lauria
WHITE & CASE LLP
Southeast Financial Center
200 South Biscayne Boulevard, Suite 4900
Miami, Florida 33131-2352
Telephone: (305) 371-2700
Facsimile: (305) 358-5744
tlauria@whitecase.com

J. Christopher Shore
Samuel P. Hershey
Andrew Zatz
Erin Smith
Brett Bakemeyer
Jade Yoo
WHITE & CASE LLP
1221 Avenue of the Americas
New York, New York 10020-1095
Telephone: (212) 819-8200
Facsimile: (212) 354-8113
cshore@whitecase.com
sam.hershey@whitecase.com
azatz@whitecase.com
erin.smith@whitecase.com
brett.bakemeyer@whitecase.com
jade.yoo@whitecase.com

*Counsel for Ad Hoc Group of Freedom
Lenders*